

December 1, 2023

*Via ECF*

Hon. Victoria Reznik, U.S.M.J.  
United States District Court  
Southern District of New York  
300 Quarropas Street, Room 420  
White Plains, NY 10601



Re: *Thompson's Transport, LLC v. Lisi's Towing Service, Inc.*  
Docket No. 7:23-cv-02385 (VR)

Dear Judge Reznik:

This office represents defendant Lisi's Towing Service, Inc. in this action. Pursuant to the Court's Order issued during the November 1, 2023 telephonic status conference, the parties provide this joint status letter.

The parties continue to work cordially through discovery. Since that last Court conference, the parties met and conferred regarding discovery and defendant provided a partial response to Plaintiff's deficiency letter, although an additional response is anticipated and Defendant has indicated that it intends to issue certain follow up requests. The parties also believe that continued settlement discussions may be productive following a disposition on the pending motion to dismiss Defendant's Counterclaim. To that end, the parties respectfully request that the close of all discovery be extended 30 days to February 5, 2024 from the current deadline of January 5, 2024 to allow sufficient time for the completion of paper discovery and party depositions.

Respectfully,

WADE CLARK MULCAHY LLP

/s/

**By: *Abed Z. Bhuyan***

The parties' request for an extension of discovery is  
**GRANTED.** Discovery shall be completed by  
**February 5, 2024.**

APPLICATION GRANTED

A handwritten signature in blue ink, appearing to read "Victoria Reznik", is written over a white rectangular background.

Hon. Victoria Reznik, U.S.M.J.

**Dated: December 4, 2023**

CC: All Counsel of Record (via ECF)